

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

STERLING D. BROWN,

Plaintiff,

v.

Case No. 18-CV-922

CITY OF MILWAUKEE,
CITY OF MILWAUKEE CHIEF OF
POLICE ALFONSO MORALES, in his
Official capacity,
SERGEANT SEAN A. MAHNKE,
SERGEANT JEFFREY S. KRUEGER,
OFFICER JOSEPH J. GRAMS,
OFFICER BOJAN SAMARDZIC,
OFFICER JAMES P. COLLINS,
OFFICER CRISTOBAL MARTINEZ AVILA,
OFFICER ERIK A. ANDRADE, and
OFFICER JASON P. JENSEN,

Defendants.

**UNOPPOSED CIVIL L. R. 7(h) MOTION FOR EXTENSION OF
TIME TO FILE DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO STRIKE RULE 68 OFFER OF JUDGMENT**

Defendants, by their attorney, Grant F. Langley, City Attorney, by Naomi E. Gehling, Assistant City Attorney, hereby move this Honorable Court pursuant to Civil L. R. 7(h) and Fed. R. Civ. P. 6(b)(1)(A) for an order extending the time to file the Defendants' above-noted Response to Friday, November 8, 2019 on the grounds set forth below:

1. A court may extend time prior to the expiration of the relevant time period for "good cause." Fed. R. Civ. P. 6(b)(1)(A).
2. None of the exceptions prohibiting a court from extending time stated in Fed. R. Civ. P. 6(b)(2) apply in this matter.

3. Plaintiff filed his motion to strike on Tuesday, October 8, 2019 (ECF No. 58).
4. Pursuant to Civil L. R. 7(b), Defendants' response is due on or before Tuesday, October 29, 2019.
5. Due to the significant length of Plaintiff's brief in support of his motion, Defendants' counsel has required additional time to fully address Plaintiff's legal arguments.
6. More importantly, the parties have been in communication about how to proceed in this matter as efficiently and productively as possible.
7. During telephone conversations with this office, counsel for Plaintiff indicated that he does not oppose this motion.

This motion is supported by the documents in the record. The defendants do not intend to submit a memorandum in support of this motion.

Dated at Milwaukee, Wisconsin this 29th day of October, 2019.

GRANT F. LANGLEY
City Attorney

s/N Naomi E. Gehling
NAOMI E. GEHLING
Assistant City Attorney
State Bar No. 1061388
Attorneys for Defendants

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